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6. Plaintiff's second ammended complaint was not intended to hold defendants, Brian Luffey and PrimeCare Medical, accountable for nontreatment of his pain.


7. After receiving discovery from these defendants, plaintiff will not be able to establish liability, or Deliberate Indifference, on their part for nontreatment of his pain.

8. To prevent further time and expense of Defendants, Brian Luffey, and PrimeCare Medical, Plaintiff requests these two defendants be dismissed from the remaining claim of nontreatment of his pain.

WHEREFORE, plaintiff respectfully requests that these two defendnats, Brian Luffey and PrimeCare Medical Inc., be dismissed from the remaining claim of plaintiff for non treatment of his pain. Plaintiff requests this court grant any relief it deemd fit and proper.

Respectfully submitted,

Dated: June 6th, 2016.


SHAWN MOORE #LZ-9799
S.C.I.P.
P.O. Box 99991
Pittsburgh, PA 15233

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Dismiss Defendants Luffey and PrimeCare from remaining claim, has been served on the following by depositing the same in the United States Mail, postage prepaid, in Pittsburgh, PA on June 6th, 2016.

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By: Shawn Moore
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